IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

MICHAEL DAVID SILLS and MARY SILLS,	
Plaintiffs,	
)	Case No.: 3:23-cv-00478
v.)	
SOUTHERN BAPTIST CONVENTION, et)	Judge William L. Campbell, Jr.
	Magistrate Judge Jeffery S. Frensley
al.,	
Defendants.	

PLAINTIFFS' MOTION TO COMPEL PRODUCTION OF DOCUMENTS

For the reasons set forth more fully in the accompanying Memorandum of Law, Plaintiffs, through their undersigned counsel, respectfully move to compel Defendant Guidepost Solutions LLC ("Guidepost") to produce invoices which would show 1) how much time Guidepost devoted to Jennifer Lyell's claims that David Sills sexually abused her; 2) how much time Guidepost spent writing its accusations against David Sills in the Report; and 3) how much money Guidepost billed Defendant Southern Baptist Convention for the aforesaid work.

In further support of this Motion, the Declaration of Katherine B. Riley is filed contemporaneously herewith.

Dated: May 5, 2025 Respectfully submitted,

By: /s/ Katherine B. Riley

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/s/ Shannon M. McNulty

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I, Katherine B. Riley, hereby certify that on May 5, 2025, I served the above and foregoing on all counsel of record via the Court's CM/ECF filing system.

/s/ *Katherine B. Riley*Katherine B. Riley